



Doug Lieb <dlieb@klflaw.com>

Gelbard v. City of New York

3 messages

David Lebowitz <dlebowitz@klflaw.com>

Fri, Jun 25, 2021 at 4:57 PM

To: "Garcia, John (Law)" <johgarci@law.nyc.gov>, Adam Strychaluk <astrychaluk@klflaw.com>, Ali Frick <africk@klflaw.com>, Doug Lieb <dlieb@klflaw.com>

John,

In the parties' status letter to the Court, you committed to producing a number of categories of documents by today or sooner. We have not received any production. What is the status?

Thank you,

David Lebowitz

Partner

**Kaufman
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David Lebowitz <dlebowitz@klflaw.com>

Tue, Jun 29, 2021 at 9:21 AM

To: "Garcia, John (Law)" <johgarci@law.nyc.gov>, Adam Strychaluk <astrychaluk@klflaw.com>, Ali Frick <africk@klflaw.com>, Doug Lieb <dlieb@klflaw.com>

John, I'm following up on the below. Given that we have a conference with the Court tomorrow, a response would be appreciated.

David Lebowitz

Partner

**Kaufman
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Garcia, John (Law) <johgarci@law.nyc.gov>

Tue, Jun 29, 2021 at 9:52 AM

To: David Lebowitz <dlebowitz@klflaw.com>, Adam Strychaluk <astrychaluk@klflaw.com>, Ali Frick <africk@klflaw.com>, Doug Lieb <dlieb@klflaw.com>

Good Morning,

Unfortunately, we've had unanticipated delays. Obviously, the technical difficulties the Law Department faced at the beginning of this month hindered our ability to begin production. In addition, although we initially believed that a large portion of the documents could be produced with minimal review, it turned out that that was not the case. Given the circumstances we confronted, we did not have the resources or time to complete the production. However, review is under way and production will be forthcoming, but it will take more time than we initially thought and most likely have to be completed on a rolling basis. I am still hopeful that we will be able to produce the entire file by the August deadline that we suggested.

John L. Garcia
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From: David Lebowitz [dlebowitz@klflaw.com]

Sent: Tuesday, June 29, 2021 9:21 AM

To: Garcia, John (Law); Adam Strychaluk; Ali Frick; Doug Lieb

Subject: Re: Gelbard v. City of New York

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